

GARG GOLDEN LAW FIRM  
ANTHONY B. GOLDEN  
Nevada Bar No. 9563  
3145 St. Rose Parkway, Suite 230  
Henderson, Nevada 89052  
Tel: (702) 850-0202  
Fax: (702) 850-0204  
Email: agolden@garggolden.com  
Email: notices@garggolden.com

Counsel for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DAVID LARITA-AREOLA, JYRO REMANES,  
ANTHONY BUMCROT, JONATHAN CRUZ,  
MIRA MUNIZ, EDUARDO REYES, DANIAL  
BRIDGES, STEPHANIE MARSHALL, JASON  
COX, MATTHEW CARABALLO, ANDREW  
JONES, DEVIN MARTY, MERSADIES  
GRAVES, AMY MORENO, ANTONIO  
ROBERTO RIOS, JASE RIOS, ALAN MILES,  
RICKY WOLFINBARGER, CAMERON  
KEANE, DEREK HALLBERG, CARLOS  
FRANCISCO MARTINEZ, DIMITRIUS  
OLLARVIA, JOSHUA RIOS, JASMINE  
JONES, JESSE ROMERO, NICK RINALDO,  
ANGELICA CANELA, MICHAEL  
RODRIGUEZ, ALEXANDER BROWN,  
BAILEY KEIBLER, BRANDON  
CALDERONE, DYLAN DUGGINS, DULAL  
WOODS, JULIO ANCHONDO, SONYA  
GUERRERO, RIDGE JACOB, KAZU  
VILLIATORA, KIMBERLY BATIE, KYLE  
CHRISTOPHER, STEVEN ERVIN,  
NICHOLAS LEMOINE, DEVEN MYERS and  
DEBORAH WALKER,

Plaintiffs

vs.

VEGAS VALLEY GROWERS, LLC, a Nevada  
Limited Liability Company; JCL GROUP, LLC,  
a Nevada Limited Liability Company and JCL  
GROUP, LLP, a Nevada Limited Liability  
Partnership,

Defendants

CASE NO.: 2:20-cv-02106-CDS-EJY

**JOINT STATUS REPORT AND  
STIPULATION TO EXTEND DEADLINE  
TO FILE STIPULATION AND ORDER  
FOR DISMISSAL**

**(FIRST REQUEST)**

Plaintiffs DAVID LARITA, et al. ("Plaintiffs"), by and through their counsel of record,  
Law Offices of Michael P. Balaban, and Defendant VEGAS VALLEY GROWERS, LLC, et al.

1 (“Defendants”), by and through their counsel of record, Garg Golden Law Firm (collectively the  
2 “Parties”), file this Joint Status Report, and Stipulation to Extend Deadline to File Stipulation and  
3 Order for Dismissal (First Request) as follows:

4 1. On November 7, 2022, the Parties filed a Notice of Settlement at ECF No. 24;

5 2. This Court issued a Minute Order on November 21, 2022 [ECF No. 25] setting the  
6 deadline to finalize settlement documents for January 27, 2023;

7 3. On January 20, 2023, Defendants’ settlement funds were received by counsel for  
8 Plaintiffs;

9 4. The Parties have been working diligently to finalize settlement of this matter;  
10 however, given the sheer number of Plaintiffs, gathering signatures in the original allocated  
11 timeframe has proven to be a difficult task;

12 5. Although the Settlement Agreement has been executed by Plaintiffs, and settlement  
13 checks have been received by counsel for Plaintiffs, there are unresolved issues remaining  
14 surrounding the timeliness of receipt of certain Plaintiffs’ signatures on the Settlement Agreement;  
15 therefore,

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6. The Parties respectfully request additional time to resolve those remaining issues,  
and up to and until March 1, 2023, to file a Stipulation and Order for Dismissal of this matter;

7. IT IS SO STIPULATED.

Dated this 30th day of January 2023.

Dated this 30th day of January 2023.

LAW OFFICES OF MICHAEL P.  
BALABAN

GARG GOLDEN LAW FIRM

/s/ Michael P. Balaban  
MICHAEL P. BALABAN  
Nevada Bar No. 9370  
10726 Del Rudini Street  
Las Vegas, Nevada 89141

/s/ Anthony B. Golden  
ANTHONY B. GOLDEN  
Nevada Bar No. 9563  
3145 St. Rose Parkway, Suite 230  
Henderson, Nevada 89052

Counsel for Plaintiffs

Counsel for Defendants

**ORDER**

FOR GOOD CAUSE APPEARING, IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE

DATED: February 1, 2023